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KEYPOINT GOVERNMENT SOLUTIONS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DONALD LOUNIBOS, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

KEYPOINT GOVERNMENT  
SOLUTIONS, INC., a Delaware  
Corporation and DOES 1-10, inclusive,

Defendants.

Case No. 12-CV-0636 (EMC)

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING ADR DEADLINE  
AND CONTINUING CASE  
MANAGEMENT CONFERENCE**

1 The parties hereby stipulate as follows:

2 WHEREAS, the instant matter was referred to panel mediation through the ADR Department  
3 of the Northern District of California. The parties were assigned to mediate this matter with the  
4 Honorable David A. Garcia (Ret.) through JAMS in San Francisco, California. To this end, the  
5 parties' current deadline to complete mediation is October 15, 2012. A Further Case Management  
6 Conference is currently scheduled to take place on October 26, 2012 at 10:30 a.m. in Courtroom 5,  
7 before the Honorable Edward M. Chen;

8 WHEREAS, the parties have exchanged documentation and taken the deposition of the  
9 Plaintiff Donald Lounibos, as well as taken the depositions of two employees at Defendant KeyPoint  
10 Government Solutions, Inc. During the depositions, the parties acknowledged the need for an  
11 additional exchange of documentation in order to ensure a productive mediation. As a result, the  
12 mediation with Judge David A. Garcia (Ret.) was rescheduled to take place at JAMS in  
13 San Francisco on November 2, 2012, the first mutually-agreeable date for all parties;

14 WHEREAS, the parties respectfully request that the Court grant a 30-day continuance of the  
15 parties' mediation deadline so that the parties can take part in mediation with Judge Garcia on  
16 November 2, 2012;

17 IT IS THEREFORE STIPULATED AND AGREED that the parties shall complete all  
18 mediation efforts on or before November 15, 2012. The parties further stipulate to continue the Case  
19 Management Conference until November 30, 2012, at 10:30 a.m. in Courtroom 5, if that date is  
20 convenient to the Court. The parties shall file a Joint Case Management Statement at least one week  
21 prior to the Case Management Conference.

22 **IT IS SO STIPULATED.**

23 DATED: October 10, 2012

24 NORTH BAY LAW GROUP

25  
26 /s/  
27 David S. Harris  
28 Attorney For Plaintiff  
DONALD LOUNIBOS

1 DATED: October 10, 2012

2 LITTLER MENDELSON

3 /s/

4 Michelle Heverly  
5 Attorneys for Defendant  
6 KEYPOINT GOVERNMENT SOLUTIONS

7 **IT IS HEREBY ORDERED AS FOLLOWS:**

8 The parties shall engage in mediation with Hon. David A. Garcia at JAMS in San Francisco  
9 on November 2, 2012, and all mediation efforts shall be completed on or before November 15, 2012.  
10 The Case Management Conference is continued to November 30, 2012, at 10:30 a.m. in  
11 Courtroom 5. The parties shall file a Joint Case Management Statement at least one week prior to  
12 the Conference.

13  
14 DATED: October 15, 2012



15 Honorable Edward M. Chen  
16 *United States District Court Judge*

17 Firmwide:115081196.1 063273.1017